

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAPHAEL AGBUNE,  
LINDA LOVING,

Defendants.

07 CRIM. 395

07 Cr.

COUNT ONE

The Grand Jury charges:

From in or about March 2005, through in or about January 2006, in the Southern District of New York and elsewhere, RAPHAEL AGBUNE and LINDA LOVING, the defendants, unlawfully, willfully and knowingly, did embezzle, steal, purloin, and convert to their own use, money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Housing and Urban Development, and did receive, conceal, and retain the same with intent to convert it to their own use and gain, knowing it to have been embezzled, stolen, purloined and converted, the value of which exceeded \$1,000, to wit, AGBUNE, an employee with New York City Department of Homeless Services, and LOVING, a real estate broker, embezzled and attempted to embezzle approximately \$25,750.00 in Housing Stability Plus subsidies, by falsely claiming that LOVING acted as a broker at certain real estate transactions.

(Title 18, United States Code, Sections 641 and 2.)

*John L. Lytle*  
FOREPERSON

*Michael J. Garcia*  
MICHAEL J. GARCIA  
United States Attorney

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INDICTMENT

07 Cr.

(18 U.S.C. §§ 641 and 2)

MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

  
Foreperson.

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HR 5/8/07

Filed indictment. Case assigned to Crotty, J. A/w issued  
for defendants Loving and Agbune

— Francis, J.